

CLERK COMMON  
PLEAS COURT  
LICKING CO. OHIO

2023 APR 28 PM 3:43

OLIVIA C. PARKINSON  
CLERK

**IN THE COURT OF COMMON PLEAS, LICKING COUNTY, OHIO**

David E. Smith  
417 N. 11<sup>th</sup> Street  
Newark, Ohio 43055

Sigrid Smith  
417 N. 11<sup>th</sup> Street  
Newark, Ohio 43055

CASE NO.:  
JUDGE:

**23CV00477**

**WDB**

Plaintiff(s)

vs.

American Red Cross of  
East Central Ohio  
143 South 30<sup>th</sup> Street  
Newark, Ohio 43055

Defendant

**COMPLAINT WITH JURY DEMAND ENDORSED HEREON**

1. Plaintiff, David E. Smith, states that on April 30, 2021 at the Newark, Ohio blood donor's location of the American Red Cross of East Central Ohio, Defendant negligently administered the blood donation process and released Plaintiff from their location and care without due regard for his condition and safety.
2. As a direct and proximate result of the negligence of the defendant and their employees and agents, plaintiff lost consciousness and drove off the road and crashed his vehicle into the side of a brick building, thereby seriously injuring plaintiff.
3. As a direct and proximate result of the negligence of the Defendant, American Red Cross, Plaintiff, David E. Smith, has been required to undergo numerous testing procedures, and other care and treatment from his physicians and others.
4. As a direct and proximate result of the negligence of the Defendant, American Red Cross, Plaintiff, David E. Smith, has incurred expenses of said care and treatment, the exact amount

of which is presently unknown. Plaintiff expects to incur further such expenses in the future.

5. As a direct and proximate result of the negligence of the Defendant, American Red Cross, Plaintiff, Sigrid Smith, has been deprived of the services and consortium of her spouse, David E. Smith.

WHEREFORE, Plaintiffs demand judgment against the Defendants in an amount in excess of Twenty-Five Thousand (\$25,000) Dollars, plus costs and interest.



Robert B. Handelman (0025619)  
*Attorney for Plaintiffs*  
Handelman Law  
Office 29 South  
Park Place Newark  
OH 43055  
Telephone: 740-349-8581  
Fax: 740-345-4101  
Robert@HandelmanLawOffice.com

**JURY DEMAND**

Plaintiffs demand a trial of this cause by a jury.



Robert B. Handelman (0025619)  
*Attorney for Plaintiffs*